

Matthew Diggs, WSBA No. 36331
Davis Wright Tremaine LLP
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Hon. Whitman L. Holt

*Special Counsel for the Chapter 11 Debtors
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re

EASTERDAY RANCHES, INC., et al.,

Debtors.¹

Chapter 11

No. 21-00141-WLH11
(Jointly Administered)

**MONTHLY FEE APPLICATION
OF DAVIS WRIGHT TREMAINE
LLP FOR ALLOWANCE AND
PAYMENT OF INTERIM
COMPENSATION AND
REIMBURSEMENT OF
EXPENSES FOR THE PERIOD
OF APRIL 1, 2022 THROUGH
APRIL 30, 2022**

[No Hearing Required Pursuant to
L.B.R. 2002-1(c)(1)]

¹ The Debtors along with their case numbers are as follows: Easterday Ranches, Inc. (21-00141) and Easterday Farms, a Washington general partnership (21-00176).

Davis Wright Tremaine LLP (the “Firm”) submits its monthly fee application (the “Application”) for allowance and payment of interim compensation and reimbursement of expenses for the period of April 1, 2022 – April 30, 2022 (the “Application Period”) for work performed for the Debtors. In support of the Application, the Firm respectfully represents as follows:

The Firm is special counsel to the Debtors. The Firm hereby applies to the Court for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the Application Period.

1. The Firm billed a total of \$18,240.24 in fees and expenses during the Application Period. The total fees represent 28.4 hours expended during the period covered by this Application. These fees and expenses break down as follows:

Period	Fees	Expenses	Total
April 1, 2022 – April 30, 2022	\$18,135.50	\$104.74	\$18,240.24

SUMMARY BY DEBTOR

	Ranches	Farms	Both Debtors
Fees	\$9,067.75	\$9,067.75	\$18,135.50
Expenses	\$52.37	\$52.37	\$104.74
Total	\$9,120.12	\$9,120.12	\$18,240.24
Hours	14.20	14.20	28.4

2. Accordingly, the Firm seeks allowance of interim compensation in the amount of a total of \$14,613.14 at this time. This total is comprised as follows: \$14,508.40 (80% of the fees for services rendered) plus \$104.74 (100% of the expenses incurred).

3. For the post-petition period, the Firm has been paid to date as follows:

DAVIS WRIGHT TREMAINE LLP’S MONTHLY
FEE APPLICATION (Case No. 21-00141-WLH11) - 2

4873-7001-2708v.1 0117168-000003

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150

Application Period	Amount	Description
First (02/01/2021 – 03/31/2021)	\$256,185.55	100% fees and 100% expenses
Second (04/01/2021 – 04/30/2021)	\$163,234.16	100% fees and 100% expenses
Third (05/01/2021 – 05/31/2021)	\$154,937.60	100% fees and 100% expenses
Fourth (06/01/2021 – 06/30/2021)	\$157,563.44	100% fees and 100% expenses
Fifth (07/01/2021 – 07/31/2021)	\$151,831.30	100% fees and 100% expenses
Sixth (08/01/2021 – 08/31/2021)	\$60,459.99	100% fees and 100% expenses
Seventh (09/01/2021 – 09/30/2021)	\$15,103.00	100% fees and 100% expenses
Eight (10/01/2021 – 10/31/2021)	\$32,169.64	100% fees and 100% expenses
Ninth (11/01/2021 – 11/30/2021)	\$18,280.14	100% fees and 100% expenses
Tenth (12/01/2021 – 12/31/2021)	\$20,611.63	100% fees and 100% expenses
Eleventh (01/01/2022 – 1/31/2022)	\$13,249.13	100% fees and 100% expenses
Twelfth (02/01/2022 – 02/28/2022)	\$11,014.68	100% fees and 100% expenses
Thirteenth (03/01/2022–3/31/2022)	\$24,315.40	80% of fees and 100% of expenses
Total Paid To The Firm To Date	\$1,078,955.66	

4. To date, the Firm is owed as follows (excluding amounts owed pursuant to this Application):

Application Period	Amount	Description
First (02/01/2021 – 03/31/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Second (04/01/2021 – 04/30/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Third (05/01/2021 – 05/31/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Fourth (06/01/2021 – 06/30/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Fifth (07/01/2021 – 07/31/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Sixth (08/01/2021 – 08/31/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Seventh (09/01/2021–09/30/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback

DAVIS WRIGHT TREMAINE LLP'S MONTHLY
FEE APPLICATION (Case No. 21-00141-WLH11) - 3

4873-7001-2708v.1 0117168-000003

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Eighth (10/01/2021 – 10/31/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Ninth (11/01/2021 – 11/30/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Tenth (12/01/2021 – 12/31/2021)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Eleventh (01/01/2022 – 1/31/2022)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Twelfth (02/01/2022 – 2/28/2022)	\$0 \$0	80% of fees and 100% of expense 20% fee holdback
Thirteenth (3/01/2022–3/31/2022)	\$0 \$6,055.10	80% of fees and 100% of expense 20% fee holdback
Total Owed To the Firm To Date	\$6,055.10	

5. Attached as **Exhibit A** hereto is the name of each professional who performed services in connection with this case during the period covered by this Application and the hourly rate for each such professional. Attached hereto as **Exhibit B** are the detailed time and expense statements for the Application Period.

6. The Firm has served a copy of this Application on the above-captioned debtors (the “Debtors”), counsel to the Debtors, counsel to the Official Committees of Unsecured Creditors appointed in these cases, and the Office of the United States Trustee. The Application was mailed by first class mail, postage prepaid, on or about June 10, 2022. Notice of the filing of this Application was served on the foregoing parties as well as any party who has requested special notice in these chapter 11 cases as of the date of the Notice. The Notice was mailed by first class mail, postage prepaid, on or about June 10, 2022.

7. Pursuant to this court’s *Order Authorizing Interim Fee Application and Expense Reimbursement Procedures* that was entered on or about April 15, 2021, the Debtors are authorized to make the payment requested herein without a further hearing or order of this court unless an objection to this Application is filed with the court and served upon the Notice Parties within fourteen (14) calendar days after the date of mailing of the Notice of this Application. If such an objection is filed, the Debtors are

1 authorized to pay 80% of the uncontested fees and 100% of the uncontested expenses
2 without further order of the court. If no objection is filed, the Debtors are authorized to
3 pay 80% of all fees requested in the Application and 100% of the uncontested expenses
4 without further order of the court.

5 8. The interim compensation and reimbursement of expenses sought in this
6 Application are not final. Upon the conclusion of these cases, the Firm will seek fees
7 and reimbursement of the expenses incurred for the totality of the services rendered in
8 these cases. Any interim fees or reimbursement of expenses approved by this court and
9 received by the Firm (along with any retainer) will be credited against such final fees
10 and expenses as may be allowed by this court.

11 WHEREFORE, the Firm respectfully requests that the Debtors pay compensation
12 to the Firm as requested herein pursuant to and in accordance with the terms of the
13 Order Authorizing Interim Fee Procedures.

14 DATED this 10th day of June, 2022.

15
16 DAVIS WRIGHT TREMAINE LLP
17 Special Counsel for the Chapter 11 Debtors and
18 Debtors in Possession

19 By: s/ Matthew Diggs
20 Matthew D. Diggs, WSBA #36331
21 920 Fifth Avenue, Suite 3300
22 Seattle, WA 98104-1610
23 Phone: (206) 622-3150
24 Email: matthewdiggs@dwt.com

25 Submitted by:

26 BUSH KORNFELD LLP

27 /s/ Thomas A. Buford, III
28 THOMAS A. BUFORD, III (WSBA 52969)
BUSH KORNFELD LLP

*Attorneys for the Debtors and
Debtors in Possession*

DAVIS WRIGHT TREMAINE LLP'S MONTHLY
FEE APPLICATION (Case No. 21-00141-WLH11) - 5

4873-7001-2708v.1 0117168-000003

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EXHIBIT A

Summary Chart by Professional

Name	Title	Hourly Rate	Total Billed Hours	Total Billed Amount
Diggs, Matthew	Contract Partner	\$700	11.1	\$7,770.00
Johnson, Lauren	Counsel	\$565	0.8	\$452.00
McCullough, Hugh	Equity Partner	\$760	0.6	\$456.00
Neves, Nara	Paralegal	\$380	9.0	\$3,420.00
Weigand, Bill	Equity Partner	\$875	6.9	\$6,037.50
Total			28.4	\$18,135.50

EXHIBIT B
Monthly Invoices for April, 2022



Anchorage | Bellevue | Los Angeles | New York
Portland | San Francisco | Seattle | Washington, D.C.

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Easterday Ranches, Inc.
Alan Kornfeld
c/o Pachulski Stang Ziehl
10100 Santa Monica Blvd, 13th Floor
Los Angeles, CA 90067-4003
akornfeld@pszjlaw.com

May 4, 2022
Invoice #6903127

Matter Name: DOJ Grand Jury Investigation
Firm Matter Number: 0117168.000001
DWT Attorney: Matthew Diggs (matthewdiggs@dwt.com)

Invoice for Fees and Costs

Total Current Fees	5,250.00
Total Current Costs	44.10

Total Amount Due This Invoice	\$ 5,294.10
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: MAY 4, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6888936	03/09/22	2,343.08	2,072.78	04/29/22	270.30
6895526	04/05/22	4,450.00	0.00		4,450.00
Previous Balance Total					4,720.30
6903127 (This Invoice)	05/04/22	5,294.10			5,294.10
Total Due This Matter					\$10,014.40

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
04/05/22	M. Diggs	0.40	280.00	Review recent pleadings in general bankruptcy matter and adversary proceedings
04/06/22	M. Diggs	1.00	700.00	WIP call and prepare for same
04/12/22	M. Diggs	0.20	140.00	Review bankruptcy court and adversary proceeding dockets

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
04/13/22	M. Diggs	0.50	350.00	Review WIP Plan, and bankruptcy and adversary proceeding dockets (0.2); attend WIP call (0.3)
04/15/22	M. Diggs	1.20	840.00	Review Global Settlement Notice, Motion, Term sheet, and related orders (1.0); draft email to J. Rossell regarding DOJ consent issue (0.2)
04/19/22	M. Diggs	1.00	700.00	Attend hearing on motion to approve settlement term sheet
04/20/22	M. Diggs	1.60	1,120.00	WIP Call (0.8); review case law regarding offset of restitution based on money collected by bankruptcy trustee/estate (0.8)
04/22/22	M. Diggs	0.60	420.00	Phone conference with J. Misely regarding DOJ consent process and communications (0.4); draft notes regarding same (0.2)
04/27/22	M. Diggs	0.90	630.00	Attend WIP Call (0.7); review docket and WIP plan in advance (0.2)
04/29/22	M. Diggs	0.10	70.00	Review correspondence from J. Misely regarding DOJ consent to settlement
TOTAL		7.50	\$5,250.00	

COSTS:

<u>NARRATIVE</u>	<u>AMOUNT</u>
Online research - THE BUREAU OF NATIONAL AFFAIRS INC (BNA) - 04/04/2022, 20196404 / Bloomberg Docket Track, 03-2022-1. Due Date: 5/4/2022, per Pat McGrath - 50 - 109	44.10
TOTAL COSTS	\$44.10

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Diggs, M.	7.50	\$700.00	\$5,250.00
Total for Partner	7.50		\$5,250.00
TOTAL	7.50		\$5,250.00

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Client Name: Easterday Ranches, Inc.
Firm Matter Number: 0117168.000001
DWT Attorney: Matthew Diggs



Invoice # 6903127
Page 3 of 4

TOTAL AMOUNT DUE THIS INVOICE	\$	5,294.10
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REMITTANCE

Davis Wright Tremain LLP
PO Box 7410478
Chicago IL 60674-0478

Easterday Ranches, Inc.
Alan Kornfeld
c/o Pachulski Stang Ziehl
10100 Santa Monica Blvd, 13th Floor
Los Angeles, CA 90067-4003

May 4, 2022
Invoice #6903127

Matter Name: DOJ Grand Jury Investigation
Firm Matter Number: 0117168.000001
DWT Attorney: Matthew Diggs (matthewdiggs@dwt.com)

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	5,294.10
PRIOR OUTSTANDING BALANCE	\$	4,720.30
TOTAL AMOUNT DUE	\$	10,014.40

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akornfeld@pszjlaw.com

May 13, 2022
Invoice #6905639

Matter Name: Asset Disposition
Firm Matter Number: 0117168.000002
DWT Attorney: Bill Weigand (billweigand@dwt.com)

Invoice for Fees and Costs

Total Current Fees	6,489.50
Total Current Costs	60.64

Total Amount Due This Invoice	\$ 6,550.14
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: MAY 13, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6889051	03/11/22	6,880.60	0.00		6,880.60
6896780	04/11/22	23,058.00	0.00		23,058.00
Previous Balance Total					29,938.60
6905639 (This Invoice)	05/13/22	6,550.14			6,550.14
Total Due This Matter					\$36,488.74

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
04/06/22	B. Weigand	0.60	525.00	Participate in WIP call (.6)
04/13/22	B. Weigand	0.30	262.50	Review docket and WIP updates (.1); review real estate matters regarding possible compromise (.2)
04/15/22	B. Weigand	0.60	525.00	Begin review of global settlement terms (.4); communicate regarding same and document needed (.2)

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
04/17/22	B. Weigand	1.10	962.50	Continued review of global settlement pleadings (.6); strategy regarding terms of settlement and documentation (.5)
04/20/22	B. Weigand	1.20	1,050.00	Participate in WIP call (.8); review WIP checklist (.1); plan documentation of settlement (.3)
04/22/22	B. Weigand	0.80	700.00	Summarize documentation necessary for global settlement (.6); communications regarding same (.2)
04/23/22	B. Weigand	1.40	1,225.00	Review settlement materials (1.2); plan documentation (.2)
04/26/22	B. Weigand	0.90	787.50	Analyze open issues regarding global settlement (.2); correspondence regarding same (.1); participate in coordination call regarding settlement documentation (.6)
04/26/22	L. Johnson	0.80	452.00	Review WIP regarding global settlement (.2); telephone conference with J. Misley and T. Conley regarding global settlement term sheet (.6)
TOTAL		7.70	\$6,489.50	

COSTS:

<u>NARRATIVE</u>	<u>AMOUNT</u>
Online research - THE BUREAU OF NATIONAL AFFAIRS INC (BNA) - 04/04/2022, 20196404 / Bloomberg Docket Track, 03-2022-1. Due Date: 5/4/2022, per Pat McGrath - 50 - 109	60.64
TOTAL COSTS	\$60.64

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Weigand, B.	6.90	\$875.00	\$6,037.50
Total for Partner	6.90		\$6,037.50
COUNSEL			
Johnson, L.	0.80	\$565.00	\$452.00
Total for Counsel	0.80		\$452.00
TOTAL	7.70		\$6,489.50

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Client Name: Easterday Ranches, Inc.
Firm Matter Number: 0117168.000002
DWT Attorney: Bill Weigand



Invoice # 6905639
Page 3 of 4

TOTAL AMOUNT DUE THIS INVOICE	\$	6,550.14
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REMITTANCE

Davis Wright Tremain LLP
PO Box 7410478
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Easterday Ranches, Inc.
Alan Kornfeld
c/o Pachulski Stang Ziehl
10100 Santa Monica Blvd, 13th Floor
Los Angeles, CA 90067-4003

May 13, 2022
Invoice #6905639

Matter Name: Asset Disposition
Firm Matter Number: 0117168.000002
DWT Attorney: Bill Weigand (billweigand@dwt.com)

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	6,550.14
PRIOR OUTSTANDING BALANCE	\$	29,938.60
TOTAL AMOUNT DUE	\$	36,488.74

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akornfeld@pszjlaw.com

May 13, 2022
Invoice #6905640

Matter Name: Employment and Fee Application
Firm Matter Number: 0117168.000003
DWT Attorney: Bill Weigand (billweigand@dwt.com)

Invoice for Fees and Costs

Total Current Fees	6,396.00
Total Current Costs	0.00

Total Amount Due This Invoice	\$ 6,396.00
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OUTSTANDING INVOICES FOR THIS MATTER AS OF: MAY 13, 2022

<u>Invoice</u>	<u>Date</u>	<u>Original Amount</u>	<u>Payments/Credits</u>	<u>Last Payment</u>	<u>Amount Due</u>
6889052	03/10/22	1,791.00	0.00		1,791.00
6896781	04/11/22	2,862.50	0.00		2,862.50
Previous Balance Total					4,653.50
6905640 (This Invoice)	05/13/22	6,396.00			6,396.00
Total Due This Matter					\$11,049.50

PROFESSIONAL FEES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
04/14/22	M. Diggs	0.10	70.00	Review invoices for month of March for 13th fee application
04/15/22	M. Diggs	0.40	280.00	Review notice for administrative claims and internal communication with H. McCullough regarding same (.4)
04/15/22	H. McCullough	0.20	152.00	Correspondence with M. Diggs et al. regarding administrative claims

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>NARRATIVE</u>
04/18/22	M. Diggs	0.90	630.00	Review settlement motion to assure correct names input in conflict system (.6); review previous conflict disclosures (.3)
04/19/22	M. Diggs	1.00	700.00	Conference with H. McCullough regarding interim fee applications and final application process and prepare for and draft notes of same (.6); telephone call with P. Jeffries regarding same (.2); review correspondence from P. Jeffries regarding new names for conflict checks and provide same to conflicts department (.2)
04/19/22	H. McCullough	0.40	304.00	Correspondence and call with M. Diggs regarding fee applications
04/21/22	M. Diggs	0.20	140.00	Follow up email to conflicts department regarding newly disclosed parties in interest
04/21/22	N. Neves	1.80	684.00	Prepare spreadsheet of invoices for allocation of entries to Ranches and Farms (.3); review time entries for allocation between Ranches and Farms (.5); draft monthly fee application (.8); email with accounting following up on additional wires received (.1); email with analytics following up on reports in support of monthly fee application (.1)
04/22/22	N. Neves	1.90	722.00	Finalize monthly fee application (.6); emails with M. Diggs and B. Weigand regarding same and interim application (.1); email with P. Jeffries regarding interim application (.1); draft interim application (1.1)
04/24/22	M. Diggs	0.20	140.00	Review 13th fee application and supporting documents
04/25/22	N. Neves	2.60	988.00	Make edits to monthly fee application per comments (.4); email with P. Jeffries regarding filing of monthly fee application (.1); draft notice of fourth interim application (.4); draft order granting fourth interim application (.4); draft exhibits in support of fourth interim application (1.2); email with DWT Analytics following up on reports in support of fourth interim application (.1)
04/28/22	N. Neves	2.50	950.00	Review reports provided by analytics in support of fourth interim application (.2); revise fourth interim application with information provided in reports (.5); revised notice of fourth interim application (.2); revise proposed order (.3); revise exhibits in support of fourth interim application (1.1); emails with M. Diggs and B. Weigand transmitting draft fourth interim application for review (.2)
04/29/22	M. Diggs	0.80	560.00	Draft and Revise Fourth Interim Fee application and supporting documents
04/29/22	N. Neves	0.20	76.00	Emails with M. Diggs regarding edits to fourth interim application
TOTAL		13.20	\$6,396.00	

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Client Name: Easterday Ranches, Inc.
Firm Matter Number: 0117168.000003
DWT Attorney: Bill Weigand



Invoice # 6905640
Page 3 of 4

TIMEKEEPER SUMMARY			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PARTNER			
Diggs, M.	3.60	\$700.00	\$2,520.00
McCullough, H.	0.60	\$760.00	\$456.00
Total for Partner	4.20		\$2,976.00
PARALEGAL			
Neves, N.	9.00	\$380.00	\$3,420.00
Total for Paralegal	9.00		\$3,420.00
TOTAL	13.20		\$6,396.00

TOTAL AMOUNT DUE THIS INVOICE	\$	6,396.00
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REMITTANCE

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May 13, 2022
Invoice #6905640

Matter Name: Employment and Fee Application
Firm Matter Number: 0117168.000003
DWT Attorney: Bill Weigand (billweigand@dwt.com)

Invoice for Fees and Costs

TOTAL AMOUNT DUE THIS INVOICE	\$	6,396.00
PRIOR OUTSTANDING BALANCE	\$	4,653.50
TOTAL AMOUNT DUE	\$	11,049.50

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Hon. Whitman L. Holt

*Special Counsel for the Chapter 11 Debtors
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re

EASTERDAY RANCHES, INC., *et al.*

Debtors.²

Chapter 11

No. 21-00141-WLH11
(Jointly Administered)

**NOTICE OF MONTHLY FEE
APPLICATION OF DAVIS
WRIGHT TREMAINE LLP FOR
ALLOWANCE AND PAYMENT OF
INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD APRIL 1, 2022
THROUGH APRIL 30, 2022**

[No Hearing Required Pursuant to
L.B.R. 2002-1(c)(1)]

**TO: THE OFFICE OF THE UNITED STATES TRUSTEE, THE OFFICIAL
COMMITTEES OF UNSECURED CREDITORS, AND OTHER PARTIES IN
INTEREST**

² The Debtors along with their case numbers are as follows: Easterday Ranches, Inc.,
(21-00141) and Easterday Farms, a Washington general partnership (21-00176).

DAVIS WRIGHT TREMAINE LLP'S MONTHLY
FEE APPLICATION (Case No. 21-00141-WLH11) - 1

4873-7001-2708v.1 0117168-000003

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150

PLEASE TAKE NOTICE that the professional listed on the chart below (the “Professional”) has applied to the United States Bankruptcy Court for the Eastern District of Washington for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the period commencing April 1, 2022 and ending April 30, 2022 (the “Application Period”). As detailed below, the Professional seeks allowance and payment of interim compensation for 80% of the fees for services rendered, plus 100% of the expenses incurred during the Application Period.

Professional’s Name and Address	Position	Applicati on Period	Total (100%) Fees Incurred	Total (100%) Expenses Incurred	80% of Fees Incurred	Total requested in this Application (80% of Fees and 100% of Expenses)	Hold Back (20% of fees)
Davis Wright Tremaine LLP	Special Counsel to Debtors	04.01.22 – 04.30.22	\$18,135.50	\$104.74	\$14,508.40	\$14,613.14	\$3,627.10
Totals			\$30,275.50	\$95.00	\$24,220.40	\$24,315.40	\$6,055.10

Pursuant to the *Order Authorizing Interim Fee Application and Expense Reimbursement Procedures* which was entered by the court on or about April 15, 2021 [Docket No. 583], any party objecting to the allowance and payment of interim compensation and reimbursement of expenses as requested must file a written objection with the Court and serve a copy of that objection upon the Professional whose Monthly Fee Application is the subject of the objection, the Debtors and their counsel of record, each of the Committees and their counsel of record, and the Office of the United States Trustee within fourteen (14) calendar days of the date that this Notice was mailed.

If an objection is timely filed and served, the Debtors will pay the Professional whose application is the subject of an objection only the applicable percentage of

1 those amounts not in dispute and will reserve any amounts in dispute for payment
2 after the Court hears and resolves such dispute.

3 DATED this 10th day of June, 2022.

4 DAVIS WRIGHT TREMAINE LLP
5 Special Counsel for the Chapter 11 Debtors
6 and Debtors in Possession

7 By: s/ Matthew Diggs

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13 *Submitted by:*

14 BUSH KORNFELD LLP

15 /s/ Thomas A. Buford, III

16 THOMAS A. BUFORD, III (WSBA 52969)

17 BUSH KORNFELD LLP

18 *Attorneys for the Debtors and*
19 *Debtors in Possession*